

**IN THE UNITED STATES BANKRUPTCY COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Sean N. Sinclair  
Clair S. Sinclair aka Claire S. Zahirny  
Debtor(s)

MIDFIRST BANK, its successors and/or assigns  
Movant

vs.

Sean N. Sinclair  
Clair S. Sinclair aka Claire S. Zahirny  
Debtor(s)

Kenneth E. West  
Trustee

CHAPTER 13

NO. 23-13208 AMC

**PRAECIPE TO WITHDRAW**

**TO THE CLERK OF THE BANKRUPTCY COURT:**

Kindly withdraw the Objection to Confirmation of MIDFIRST BANK, which was filed with the Court on or about January 24, 2024.

Dated: December 16, 2024

Respectfully submitted,

/s/Denise Carlon  
Denise Carlon, Esq.  
KML Law Group, P.C.  
BNY Mellon Independence Center  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
Phone: (215)-627-1322  
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**IN RE: Sean N. Sinclair Clair S. Sinclair  
aka Claire S. Zahirny**

**Debtor(s)**

**MIDFIRST BANK**

**Movant**

**vs.**

**Sean N. Sinclair Clair S. Sinclair aka  
Claire S. Zahirny**

**Debtor(s)**

**Kenneth E. West**

**Trustee**

**BK NO. 23-13208 AMC**

**Chapter 13**

**CERTIFICATE OF SERVICE**

I, Denise Carlon, certify that on 12/16/2024, I did cause a true and correct copy of the documents described below to be served on the parties listed on the mailing list exhibit, a copy of which is attached and incorporated as if fully set forth herein, by the means indicated and to all parties registered with the Clerk to receive electronic notice via the CM/ECF system:

- Praeipie to Withdraw

I certify under penalty of perjury that the above document(s) was sent using the mode of service indicated.

Dated: 12/16/2024

/s/ Denise Carlon  
Denise Carlon, Esquire  
Attorney I.D. 317226  
KML Law Group, P.C.  
BNY Mellon Independence Center  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
201-549-2363  
[bkgroup@kmlawgroup.com](mailto:bkgroup@kmlawgroup.com)

Name and Address of Party Served	Relationship of Party	Via
<p>Sean N. Sinclair 3307 Sheldon Avenue Bristol, PA 19007</p> <p>Clair S. Sinclair aka Claire S. Zahirny 3307 Sheldon Avenue Bristol, PA 19007</p>	Debtors	<p><input type="checkbox"/> Hand-delivered</p> <p><input checked="" type="checkbox"/> First Class Mail</p> <p><input type="checkbox"/> Certified mail</p> <p><input type="checkbox"/> E-mail</p> <p><input type="checkbox"/> CM/ECF</p> <p><input type="checkbox"/> Other</p> <p>_____</p> <p>(as authorized by the court *)</p>
<p>Paul H. Young, Esq. 3554 Hulmeville Road Suite 102 Bensalem, PA 19020</p>	Attorney for Debtors	<p><input type="checkbox"/> Hand-delivered</p> <p><input checked="" type="checkbox"/> First Class Mail</p> <p><input type="checkbox"/> Certified mail</p> <p><input type="checkbox"/> E-mail</p> <p><input checked="" type="checkbox"/> CM/ECF</p> <p><input type="checkbox"/> Other</p> <p>_____</p> <p>(as authorized by the court *)</p>
<p>Kenneth E. West Office of the Chapter 13 Standing Trustee 1234 Market Street - Suite 1813 Philadelphia, PA 19107</p>	Trustee	<p><input type="checkbox"/> Hand-delivered</p> <p><input checked="" type="checkbox"/> First Class Mail</p> <p><input type="checkbox"/> Certified mail</p> <p><input type="checkbox"/> E-mail</p> <p><input type="checkbox"/> CM/ECF</p> <p><input type="checkbox"/> Other</p> <p>_____</p> <p>(as authorized by the court *)</p>